

CAC

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M-10-851

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)
and 960)

KIEL REYES,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

JAMES W. HOLT, being duly sworn, deposes and states that he is a Special Agent with United States Immigration and Customs Enforcement ("ICE"), duly appointed according to law and acting as such.

Upon information and belief, on or about July 24, 2010, within the Eastern District of New York and elsewhere, defendant KIEL REYES did knowingly, intentionally and unlawfully import into the United States from a place outside thereof cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

^{1/} Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. At approximately 12:30 a.m. on July 24, 2010, defendant KIEL REYES arrived at John F. Kennedy International Airport in Queens, New York, aboard Carribean Airlines, flight number 524 from Trinidad.

2. Defendant KIEL REYES was selected for a routine baggage exam. A Customs and Border Protection ("CBP") officer asked the defendant if the briefcase and black roller bag that he was carrying belonged to him, and he responded that they did. Upon examining the briefcase, the CBP officer noticed that the sides were unusually thick and that the briefcase felt heavy.

3. The CBP officer then escorted the defendant to a private search room to further examine the briefcase. At that time, the briefcase was probed to reveal a white powdery substance. The substance field-tested positive for the presence of cocaine. At that point, the defendant KIEL REYES was placed under arrest.

4. The total approximate gross weight of the cocaine found in defendant KIEL REYES's briefcase is 986 grams.

WHEREFORE, your deponent respectfully requests that defendant KIEL REYES be dealt with according to law.



JAMES HOLT
Special Agent
Immigration and Customs
Enforcement

Sworn to before me this 24th day of July, 2010

THE HONORABLE STEVEN M. GOLD
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK